

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**STEPHEN MCCOLLUM, *et al.*,**  
*Plaintiffs,*

**v.**

**BRAD LIVINGSTON, *et al.*,**  
*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§

**CIVIL NO. 4:14-CV-3253**

**DEFENDANTS' NOTICE OF SUPPLEMENT TO  
REPORT OF TRAK ENGINEERING, INC.**

**NOW COME** Texas Department of Criminal Justice, Brad Livingston, Robert Eason, Jeff Pringle, Richard Clark, Karen Tate, and Sandra Sanders (collectively the "TDCJ Defendants") by and through their attorneys, the Office of the Attorney General of Texas, and submit Defendants' Notice of Supplement to Report of Trak Engineering, Inc.

Trak Engineering, Inc. supplements their report for the Hutchins State Jail, disclosed in *David Bailey, et al. v. Brad Livingston, et al.*, Cause No. 4:14-cv-01698 (S.D. Tex. Sept. 10, 2015). The report is supplemented to include their expert statements required pursuant to Fed. R. Civ. P. 26(a)(2)(B), their calculation data for their opinion regarding the Hutchins State Jail, and the supplemental report of Frank Traknyak.

Respectfully Submitted,

KEN PAXTON  
Attorney General of Texas

JEFF MATEER  
First Assistant Attorney General

JAMES E. DAVIS  
Deputy Attorney General for Civil Litigation

KAREN D. MATLOCK  
Division Chief  
Law Enforcement Defense Division

/s/ Daniel C. Neuhoff  
DANIEL C. NEUHOFF  
Assistant Attorney General  
Co Counsel  
Texas Bar No. 24088123  
Southern District No. 2374885  
[Daniel.neuhoff@texasattorneygeneral.gov](mailto:Daniel.neuhoff@texasattorneygeneral.gov)

CYNTHIA L. BURTON  
Assistant Attorney General  
Attorney in Charge  
Texas Bar No. 24057611  
Southern District No. 35273  
[Cynthia.burton@texasattorneygeneral.gov](mailto:Cynthia.burton@texasattorneygeneral.gov)

MATTHEW J. GREER  
Assistant Attorney General  
Co-Counsel  
Texas Bar No. 24069825  
Southern District No. 1171775  
[Matthew.Greer@texasattorneygeneral.gov](mailto:Matthew.Greer@texasattorneygeneral.gov)

Office of the Attorney General of Texas  
Law Enforcement Defense Division  
P. O. Box 12548, Capitol Station  
Austin TX 78711  
(512) 463-2080/Fax (512) 936-2109

ATTORNEYS FOR TDCJ DEFENDANTS

**NOTICE OF ELECTRONIC FILING**

I, **DANIEL C. NEUHOFF**, Assistant Attorney General of Texas, certify that I have electronically submitted for filing **Defendants' Notice of Supplement to Report of Trak Engineering, Inc.** in accordance with the Electronic Case Files system of the Southern District of Texas on this day March 16, 2016.

/s/ Daniel C. Neuhoff  
DANIEL C. NEUHOFF  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, **DANIEL C. NEUHOFF**, Assistant Attorney General of Texas, certify that a true and correct copy of the above and foregoing **Defendants' Notice of Supplement to Report of Trak Engineering, Inc.** has been served electronically to all counsel or *pro se* parties of record as authorized by FED. R. CIV. P. 5 (b)(2) on March 16, 2016.

/s/ Daniel C. Neuhoff  
DANIEL C. NEUHOFF  
Assistant Attorney General